

1. The Parties have made substantial progress in consummating their settlement, which includes implementing the servicing transfer of approximately 300 mortgage loans.
2. The effective date of the servicing transfer was June 30, 2013, following which, the Parties have certain continuing obligations, including some that must be performed for approximately 60 days post-transfer in which they must account to one another for funds received and funds required to be reimbursed or paid to the other.
3. The Parties request that, instead of entering a 90-day order of dismissal as provided under Local Rule 16.3, the Court continue to stay the action pending completion of settlement obligations, and set a date for the Parties to file, at their election, either a joint motion for dismissal, or a further status report, in approximately 90 days.

The Parties expect to be in a position to dismiss this action in approximately 90 days. A further stay of the case will facilitate settlement, but premature dismissal will be prejudicial to completion of the settlement.

Dated July 3, 2013

Respectfully submitted,

/s/ Mark S. Finkelstein

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CERTIFICATE OF SERVICE

I, Mark S. Finkelstein, hereby certify that on July 3, 2013, a true copy of this document was served in accordance with the ECF filing system of the United States District Court for the Southern District of Texas to the following attorneys for Defendants Bank of America, N.A., BAC Home Loan Servicing, LP and Countrywide Home Loans, Inc. in the referenced civil action:

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/s/ Mark S. Finkelstein

Mark S. Finkelstein